

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

IN THE MATTER OF:

UNIFAB CORPORATION,

Debtor.

_____ //

Case No.: 10-13307

Chapter 11

Filed: 11/08/2010

IN THE MATTER OF:

APPLIED COATINGS, INC.,

Debtor.

_____ //

Case No.: 10-13308

Chapter 11

Filed: 11/08/2010

IN THE MATTER OF:

UNIFAB PROPERTIES, LLC,

Debtor.

_____ //

Case No.: 10-13310

Chapter 11

Filed: 11/08/2010

**DEBTORS' MOTION FOR ENTRY OF AN ORDER DIRECTING JOINT
ADMINISTRATION OF THEIR RELATED CHAPTER 11 CASES**

NOW COME Unifab Corporation, Applied Coatings, Inc. and Unifab Properties, LLC (“Debtors”) by and through its attorneys, Rayman & Stone, and for their Motion for Entry of an Order Directing Joint Administration of Their Related Chapter 11 Cases (“Motion”), state as follows:

GENERAL ALLEGATIONS

1. On November 8, 2010 (the “Petition Date”) the Debtors filed Voluntary Petitions under Chapter 11 of the United States Bankruptcy Code (the “Code”).
2. Since the Petition Date, the Debtors have operated their respective businesses as Debtor-in-Possession pursuant to §§ 1107 and 1108 of the Code.

3. No official committee of creditors holding unsecured claims has been appointed in any of the Debtors' cases. No trustee or examiner has been appointed in the cases.

4. Debtors file this Motion pursuant 11 U.S.C. §105 and Rule 1015(b).

RELIEF REQUESTED

5. In order to optimally and economically administer the Debtors' Chapter 11 cases, such cases should be jointly administered under the Unifab Corporation case.

6. Many of the motions, hearings and orders that will arise in these Chapter 11 cases will jointly affect each and every Debtor. By jointly administering these cases, the Debtors will be able to reduce fees and costs and ease the onerous administrative burden of having to file multiple and duplicative documents.

7. The request to jointly administer the Debtors cases is not prejudicial to the creditors, it does not seek to substantively consolidate the Debtors cases, but only seeks administrative consolidation.

8. The Debtors believe that the joint administration of these estates is in the best interest of the estate. As such, the Debtors request that the caption of these Chapter 11 cases be modified as follows:

**UNITED STATES BANKRUPTCY COURT
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UNIFAB CORPORATION, *et al.*,

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9. The Debtors also request that a docket entry be entered in each of the Debtors cases to reflect the joint administration of these cases substantially similar to the proposed language below or such other language as the Court deems to be appropriate:

WHEREFORE, the Debtors respectfully pray that this Court:

- A. Enter an Order granting the Motion;
- B. Consolidate, for procedure and administrative purposes only, the bankruptcy estates of Unifab Corporation, Applied Coatings, Inc. and Unifab Properties, LLC into the bankruptcy estate of Unifab Corporation; and
- C. Grant such other relief as the Court finds just and equitable.

RAYMAN & STONE
Attorneys for the Debtor

Dated: November 8, 2010

By: _____/s/_____
Cody H. Knight (P64811)

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